



Mobius Legal Group, PLLC

October 5, 2017

VIA ELECTRONIC FILING (ECFS)

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Ex Parte Presentation

- 1) *Lifeline and Link Up Reform and Modernization* (WT Docket No. 11-42)
- 2) *Modernizing the FCC Form 477 Data Program* (WC Docket No. 11-10)

Dear Ms. Dortch:

Pursuant to the Commission's *ex parte* rules (47 C.F.R. §1.1206), notice is hereby given that on Wednesday, October 4, undersigned counsel representing the Navajo Nation and the Navajo Nation Telecommunications Regulatory Commission (NNTRC), met with Allison Baker, Rashann Duvall, Jodie Griffin, Steven Rosenburg, and Roger Woock of the FCC Wireline Competition Bureau and Sayuri Rajapakse of ONAP to discuss the above proceedings.

Concerning Lifeline, undersigned counsel shared the attached Statement Navajo President Russell Begaye submitted to the Senate Homeland Security Committee in response to its September 14, 2017 oversight hearing to stress the importance of the Lifeline Program to the Navajo people, and the fact that Lifeline reforms have disproportionately impacted Native Americans.

Concerning 477 data collection, undersigned counsel discussed the fact that the FCC needs to take into consideration in its data collection that some carriers may technically serve a reservation, but nonetheless do not advertise the availability of service on the reservation or actively market their services to Native Americans. Also discussed is the fact that in very rugged terrain, such as on the Navajo Nation, wireless coverage is often significantly overstated based on the propagation models used by some carriers.

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Respectfully Submitted,

NAVAJO NATION & NAVAJO NATION
TELECOMMUNICATIONS
REGULATORY COMMISSION



James E. Dunstan

Its Attorney